coordinator would attempt to locate a channel that would permit the minimum spacings with co-channel stations, relative to their desired service area radii, using the table in Appendix D.[13]

34. On shared frequency assignments, the tables would serve as a guide for frequency coordinators. These tables could also be modified or enhanced to accommodate even more flexible Exclusive Use Overlay (EUO) procedures.[14]

B. Permit Applicants to Propose Higher Powers Upon Submission of Coverage Contours

35. In addition to the "safe harbor" tables, LMCC recommends that the Commission provide a regular procedure for applicants to request powers/heights in excess of the values provided by the tables. LMCC further recommends that primary responsibility for reviewing these showings should be assigned to the frequency coordinators.

36. A request to use powers/heights in excess of the table

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[13] Similar co-channel spacing tables are used in the FM and TV broadcasting services. See 47 C.F.R. §§73.215 and 73.610.

[14] The rules for EUO could be made more flexible to permit licensees to secure exclusivity over a larger (or smaller) radius than offered by a standard 50-mile co-channel reuse, as proposed. For example, the rules could provide that a licensee could select the radius within which it wants exclusivity (up to a certain maximum distance) on the condition that it secure concurrence from all co-channel licensees within the associated reuse distance.

would have to be accompanied by an engineering study demonstrating that the proposed facilities will not produce coverage in excess of that which the applicant reasonably requires. The Commission could require that the study be based on "generally accepted good engineering practices and standards;"[15] alternatively, the Commission could specify which land mobile prediction model(s) should be used.

C. Enhance Authority of Coordinators to Recommend Power Limits and Other Operating Conditions

37. LMCC recommends that the Commission clarify, by rule or policy, that the coordinator will be primarily responsible for reviewing an applicant's request for power/height, whether under the "safe harbor" table or through submission of coverage predictions. The Commission should specify that in the case of disagreement between the applicant and the coordinator, the applicant will bear the burden of proof and persuasion in overturning the coordinator's recommendations. The Commission would, of course, retain final authority to resolve licensing issues.

38. LMCC further recommends that the Commission clarify a coordinator's right to request additional information or showings necessary for the processing and coordination of an application;

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[15] Cf. 47 C.F.R. §§73.215 & 94.63(d)(2).

e.g., terrain profiles; HAAT calculations; ERP calculations; antenna patterns; service area requirements; or coverage predictions. If, for example, ERP and HAAT are going to be limiting factors in the licensing process, coordinators must have

difficulties, LMCC agrees with the Commission that the exclusive use overlay program proposed in the NPRM is a reasonable approach and could accomplish a substantial degree of exclusivity gradually and with minimum disruption of existing operations. The plan to involve frequency coordinators in the process is desirable and LMCC highly recommends it.

41. However, LMCC believes the Commission's proposed program should be modified as follows. Exclusivity should not be limited uniformly by a 50-mile reuse distance, as proposed, but should be related to the power and height limits and consequential co-channel separations derived from the power/height tables recommended in paragraph 26 above. Moreover, the proposed requirement that exclusive use overlay licensees convert their systems to narrowband should be modified to take into account the changes in the migration path to implementation of narrowband channels recommended by LMCC in paragraphs 11-20 above.

IV. Innovative Shared Use Operations

42. LMCC recommends that the Commission not adopt its proposal to set aside over 250 frequency pairs in the 150-162 MHz band for so-called [but not defined] "innovative shared use systems". LMCC believes that adoption of the proposal would not be in the public interest. LMCC is not aware of any substantial

land mobile requirements that could be accommodated easily and well by the type of systems contemplated by the Commission. In

solicit comment on this Consensus Plan.

WHEREFORE, THE PREMISES CONSIDERED, the Land Mobile Communications Council respectfully submits this Consensus Plan and requests Commission consideration of this Plan in conjunction with the ongoing efforts in this proceeding.

Respectfully submitted,

LAND MOBILE COMMUNICATIONS COUNCIL

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Appendices: A, B, C, D

Appendix A

VHF TABLE I
MAXIMUM ALLOWABLE ERP (watts)
(Provides 37 dbμ at service area contour per R-6602 Fig. 19)

HAAT (ft)	SERVICE AREA RADIUS (mi) 2	5	8	10	15	20	25	30	40	50	60	63
50	1	32	200	500	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
100	---	8	50	126	631	(1)	(1)	(1)	(1)	(1)	(1)	(1)
150	---	3.5	22	56	302	1000	(1)	(1)	(1)	(1)	(1)	(1)
200	---	2	13	32	158	562	(1)	(1)	(1)	(1)	(1)	(1)
250	---	1.3	8	20	100	355	1000	(1)	(1)	(1)	(1)	(1)
300	---	1	5	13	80	250	700	(1)	(1)	(1)	(1)	(1)
350	---	---	4	10	54	178	500	(1)	(1)	(1)	(1)	(1)
400	---	---	3	8	45	140	400	1000	(1)	(1)	(1)	(1)
450	---	---	2.2	6	32	105	302	759	(1)	(1)	(1)	(1)
500	---	---	2	5	25	90	250	630	(1)	(1)	(1)	(1)

Appendix B

VHF TABLE II
MINIMUM DISTANCE BETWEEN BASE STATIONS (mi)
(by service area range (mi))

Range (mi) ↓ →	2	5	8	10	15	20	25	30	40	50	60	63
2	10	17	28	37	52	56	62	69	86	100	118	127
5	17	20	31	40	55	59	65	73	89	102	121	130
8	28	31	34	43	58	62	68	76	92	105	124	133
10	37	40	43	45	60	64	70	78	94	107	126	135
15	52	55	58	60	65	69	75	83	99	112	131	140
20	56	59	62	64	69	74	80	88	104	117	136	145
25	62	65	68	70	75	80	85	93	109	122	141	150
30	69	73	76	78	83	88	93	98	114	127	146	155
40	86	89	92	94	99	104	109	114	124	137	156	165
50	100	102	105	107	112	117	122	127	137	147	166	175
60	118	121	124	126	131	136	141	146	156	166	176	185
63	127	130	133	135	140	145	150	155	165	175	185	188

ERP TABLE I
MAXIMUM ALLOWABLE ERP (watts)
(Provides 39 dbμ at service area contour per R-6602 Fig. 29)

HAAT (ft)	SERVICE AREA RADIUS (mi) 2	5	8	10	15	20	25	30	40	47
50	2.5	100	660	(1)	(1)	(1)	(1)	(1)	(1)	(1)
63	1.6	65	417	1000	(1)	(1)	(1)	(1)	(1)	(1)
100	---	26	166	400	(1)	(1)	(1)	(1)	(1)	(1)
150	---	12	76	178	1000	(1)	(1)	(1)	(1)	(1)
200	---	6.3	42	100	513	(1)	(1)	(1)	(1)	(1)
275	---	3.5	22	50	282	1000	(1)	(1)	(1)	(1)
300	---	2.8	20	45	250	831	(1)	(1)	(1)	(1)
400	---	1.6	11	25	141	500	(1)	(1)	(1)	(1)
500	---	1	6.3	16	83	316	(1)	(1)	(1)	(1)
550	---	---	5.2	125	71	250	1000	(1)	(1)	(1)
600	---	---	5	11	63	208	890	(1)	(1)	(1)
700	---	---	3.5	8	50	158	631	(1)	(1)	(1)
800	---	---	2.7	6.3	38	120	500	(1)	(1)	(1)
900	---	---	2.2	5	30	95	380	(1)	(1)	(1)
1000	---	---	1.7	4	21	80	316	1000	(1)	(1)
2000	---	---	0.5	1.3	5	20	63	200	(1)	(1)
2600	---	---	---	---	3.2	12.6	45	123	1000	(1)
3000	---	---	---	---	3	10	38	96	740	(1)
4000	---	---	---	---	2.5	6.3	20	52	390	(1)
5000	---	---	---	---	1.6	5	14	35	250	1000

Note (1): Max ERP of 1000 watts allowed. However, signal strength at the service area contour will be less than 39 dbμ.

[illegible] TABLE II
[illegible] DISTANCE BETWEEN BASE STATIONS (mi)
(by service area range (mi))

Range (mi) ↓ →	2	5	8	10	15	20	25	30	40	47
2	10	17	27	34	42	50	60	69	96	112
5	17	20	30	37	45	53	63	73	99	115
8	27	30	33	40	48	56	66	76	102	118
10	34	37	40	42	50	58	68	78	104	120
15	42	45	48	50	55	63	73	83	109	125
20	50	53	56	58	63	68	78	88	114	130
25	60	63	66	68	73	78	83	93	119	135
30	69	73	76	78	83	88	93	98	124	140
40	96	99	102	104	109	114	119	124	134	150
47	112	115	118	120	125	130	135	140	150	157